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McFADDEN, EVANS & SILL

ATTORNEYS AT LAW

1627 EYE STREET, N.W.

SUITE 810

WASHINGTON, D.C. 20006

TELEPHONE (202) 293-0700

TELECOPIER (202) 659-5409

DOUGLAS B. McFADDEN

DONALD J. EVANS

WILLIAM J. SILL

THOMAS L. JONES

WILLIAM M. BARNARD

MARIANNE H. LEPERA

CHRISTINE M. CROWE*

LEONARD W. DOOREN, III**

NANCY L. KILLIEN***

ALSO ADMITTED:

N.Y., IND., OHIO, MD., PA.,
VA., CONN., FLA., N.J., CA.

* ADMITTED CONN. ONLY
** ADMITTED MD. & N.J. ONLY
*** ADMITTED CA. ONLY

October 14, 1993

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OCT 14 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Roy J. Stewart, Chief
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W., Room 314
Washington, D.C. 20554

Re: Petition for Rule Making to Amend
Section 76.51 of the Commission's Rules

Dear Mr. Stewart:

Transmitted herewith, on behalf of WNGM Television Partners, Limited ("WNGM"), licensee of WNGM(TV), Athens, Georgia, is an original and four copies of a Petition for Rule Making. WNGM respectfully requests that the Commission commence a rule making proceeding to amend Section 76.51 of the Commission's Rules, to redesignate the "Atlanta-Rome, Georgia" market as "Atlanta-Rome-Athens, Georgia."

Please do not hesitate to contact the undersigned counsel should you have any questions in this regard.

Sincerely,



William M. Barnard

Marianne H. LePera

Counsel for WNGM Television
Partners, Limited

Enclosures

cc: L. Finch

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BEFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

RECEIVED

OCT 14 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 76.51
of the Commission's Rules to
Include Athens, Georgia in the
"Atlanta-Rome, Georgia"
Television Market

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MM Docket No. _____

To: Roy J. Stewart, Chief
Mass Media Bureau

PETITION FOR RULE MAKING

William M. Barnard
Marianne H. LePera
McFadden, Evans & Sill
1627 Eye Street, N.W.
Suite 810
Washington, D.C. 20006
(202) 293-0700

October 14, 1993

Table of Contents

	<u>Page</u>
I. Standard for Market Hyphenation	2
II. Compelling Justification Exists to Add Athens, Georgia to the Atlanta-Rome, Georgia Market Designation	3
A. The location of Athens places WNGM in direct competition with Atlanta television stations	3
B. Substantial overlap of the television stations' Grade B contours mandates competition between WNGM and Atlanta stations	4
C. Great need exists for the addition of Athens to the Atlanta market, on a hyphenated basis	6
D. Addition of Athens to the Atlanta market designation would yield tremendous benefits to the public	8
III. Conclusion	11

SUMMARY

By the instant Petition for Rule Making, WNGM Television Partners, Ltd. ("WNGM") hereby requests that the Commission undertake a rule making proceeding to modify Section 76.51 of the Commission's rules. WNGM requests that the "Atlanta-Rome, GA" television market listed in Section 76.51 be redesignated "Atlanta-Rome-Athens, GA."

Hyphenation of the Atlanta-Rome market to include Athens will eliminate an anomalous situation in which Athens television stations are considered Atlanta stations for some purposes, and Athens stations for other purposes. Market hyphenation will equalize the existing competition between the Athens stations and the other Atlanta stations, so that WNGM can compete on a level playing field. WNGM fully satisfies the Commission's standard for market hyphenation. Accordingly, it is respectfully requested that a rule making proceeding be commenced to add Athens to the Atlanta-Rome, GA television market in Section 76.51.

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In the Matter of

Amendment of Section 76.51
of the Commission's Rules to
Include Athens, Georgia in the
"Atlanta-Rome, Georgia"
Television Market

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) MM Docket No. _____
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To: Roy J. Stewart, Chief
Mass Media Bureau

PETITION FOR RULE MAKING

WNGM Television Partners, Limited ("WNGM"), licensee of commercial television station WNGM(TV), Athens, Georgia, by its attorneys, hereby requests that the Commission undertake a rule making proceeding to amend Section 76.51 of the Commission's Rules. WNGM respectfully requests that the Section 76.51 market of "Atlanta-Rome, Georgia"¹ be modified to include Athens, Georgia. The resultant hyphenated market designation would become "Atlanta-

¹ In its Report and Order released March 29, 1993, the Commission granted the request of TV-14, Inc. to amend Section 76.51 (RM-8016, MM Docket No. 92-295), thus changing the "Atlanta, Georgia" market designation to "Atlanta-Rome, Georgia." Implementation of the Cable Television Consumer Protection and Competition Act of 1992 ("Report and Order"), 8 FCC Rcd. 2965, 2978, n.149 (1993) [hereinafter "TV-14, Inc. Report and Order"].

Rome-Athens, Georgia." In support of this request,² the following is shown:

I. Standard for Market Hyphenation

The Commission has proclaimed that market hyphenation is based upon "the premise that stations licensed to any of the named communities in the hyphenated market do, in fact, compete with all stations licensed to such communities." See CATV-Non Network Agreements, 46 FCC 2d 892, 898 (1974). The hyphenation of markets "helps equalize competition" where stations do in fact compete for economic support, but portions of the market are located beyond the Grade B contours of some of the area stations." See Cable Television Report & Order, 36 FCC 2d 143, 176 (1972). With this purpose in mind, the Commission considers several factors to evaluate where market conditions exist which justify augmenting the hyphenation of the market:

- (1) the distance between the existing designated communities and the community proposed to be added to the designation;
- (2) whether cable carriage, if afforded to the subject station, would extend to areas beyond its Grade B signal coverage area;
- (3) the presence of a clear showing of particularized need by the station requesting the change in market designation; and
- (4) an indication of benefit to the public from the proposed change.

² WNGM has been informed by counsel for the Georgia Public Telecommunications Commission ("GPTC") that it will refile its Comments and Counterproposal of the Georgia Public Telecommunications Commission ("Comments"), originally filed by GPTC in MM Docket No. 92-295 (Request by TV-14, Inc.), in support of WNGM's instant Petition for Rule Making.

Amendment of Section 76.51 of the Commission's Rules to Include Clearwater, Florida, in the Tampa-St. Petersburg, Florida Television Market, 8 FCC Rcd. 5069, 5069 (1993).

II. Compelling Justification Exists to Add Athens, Georgia to the Atlanta-Rome, Georgia Market Designation

As evidenced by the facts surrounding the operation of WNGM, which is licensed to Athens, WNGM does in fact compete with Atlanta television stations.³ Market hyphenation is necessary to eliminate an existing anomalous situation, in which stations licensed to Athens are characterized as Atlanta stations for the purposes of programming and ratings, but treated as Athens stations for copyright and must-carry purposes. Given this dichotomous treatment, WNGM is relegated to an artificially inferior competitive position in a geographical area in which it does, in fact, compete with Atlanta stations.

A. The location of Athens places WNGM in direct competition with Atlanta television stations.

Downtown Athens is located approximately 58 miles from downtown Atlanta, and approximately 48 miles separate the city limits of each. Communities in similar proximity have been found to satisfy the criteria for market hyphenation. See, e.g., Request by TV-14, Inc. to Amend Section 76.51 of the Commission's Rules to Include Rome, Georgia, in the Atlanta, Georgia Television Market ("NPRM"), 7 FCC Rcd. 8591 (1992) [hereinafter "Request by TV-14, Inc."]. In its decision in Request by TV-14, Inc., Rome, which is

³ Statements of fact relevant to WNGM are supported by the Declaration of Stephen Lanier Finch, Vice-President, General Manager of WNGM, included as Attachment 1 hereto.

56 miles from Atlanta, was added to the Atlanta market designation by the Commission's Report and Order in MM Docket No. 92-295. See TV-14, Inc. Report and Order, 8 FCC Rcd. at 2978, n.149.

Both of the two major television ratings services consider Athens and Atlanta to be located within the same television market. The close proximity of Athens to Atlanta has placed these two cities within the same Arbitron ADI. See Attachment 2, Arbitron Audience Estimates for Atlanta. Arbitron reports, which designate stations as either "Home," "Home Non-ADI" or "Outside" for each market, list WNGM as a "Home" station in the Atlanta ADI. Id. WNGM is also considered a local station in Nielsen's Atlanta, GA DMA. See Attachment 3, Table 4 of Nielsen Market Data Report. Nielsen includes the city of Athens, Georgia in its Atlanta DMA. Id. The DMA, in which Nielsen defines the local television market, includes Athens, even though Athens is not included in the Office of Management and Budget's MSA. Id. This fact indicates that Nielsen believes that Atlanta and Athens compete in the same local television market. Moreover, the 1993 Broadcasting and Cable Yearbook lists Athens parenthetically to the Atlanta market, so that the market is designated as the "Atlanta (Athens & Rome)" television market. See Attachment 4, Broadcasting and Cable Yearbook 1993.

B. Substantial overlap of the television stations' Grade B contours mandates competition between WNGM and Atlanta stations.

WNGM places a Grade A signal over the eastern and northeastern areas of Atlanta, as well as a Grade B signal over what is

essentially the eastern half of the Atlanta metro area. See Attachment 5, WNGM Coverage Map.⁴ These areas comprise much of what is locally referred to as the "Golden Triangle" area. The majority of residences are located in the Golden Triangle area, as other areas, such as the southwest side of Atlanta, are largely industrial or rural (and much more sparsely populated). Moreover, six of the nine Atlanta television stations blanket Athens with their Grade B signals. See Attachment 7, 1993 Station Coverage Atlas. Accordingly, these overlapping Grade B contours create vast areas in which WNGM must compete head-to-head with Atlanta television stations for viewership, ratings, programming and advertising dollars.

Even more significant, however, is the fact that six Atlanta stations are carried on the cable system in Athens. See Attachment 8, Athens Cable Line-Up. With the exception of two small cable systems, Scripps-Howard, serving North DeKalb County, and Gulf American Cable Corp. d/b/a Rural Cablevision in West Atlanta, WNGM is not financially able to secure carriage on the major Atlanta cable systems which operate in areas of WNGM's

⁴ WNGM has been considering modification of its facilities to install an antenna which would increase its coverage area. Such a modification would also result in increased coverage of Atlanta, as indicated in the map and engineer's statement provided in Attachment 6. In the event the Commission deems it necessary, WNGM will apply for and implement the antenna change as a condition to the market redesignation.

broadcast coverage.⁵ The cable companies have requested reimbursement for additional copyright liability which would result from the carriage of WNGM, currently considered a "distant signal." See Attachment 10, Letter from Wometco Cable. Athens is not included in the Atlanta market designation on the Commission's Top 100 Market list in Section 76.51 of the Commission's Rules, and thus cannot take advantage of the expanded "local" zone which market hyphenation provides. The unequal competitive power WNGM is experiencing is ever more pronounced when cable coverage is considered, because, as indicated above, WNGM must compete against six Atlanta stations being carried on the Athens cable system, but WNGM is only transmitted by cable to only approximately 28,618 subscribers on the other Atlanta stations. See supra, footnote 5.

C. Great need exists for the addition of Athens to the Atlanta market, on a hyphenated basis.

An anomalous situation exists which places Athens television stations at a great disadvantage in competing with the other Atlanta stations. Because Athens is not included in the Atlanta market designation on the Commission's Top 100 Market list in Section 76.51 of the rules, it has effectively been "shut out" of cable carriage within what the two major ratings services classify

⁵ Scripps-Howard's North DeKalb County cable system serves only 27,432 subscribers. See Attachment 9, letter from Scripps-Howard Cable. Rural Cablevision in West Atlanta serves 1,186 subscribers. In comparison, the Nielsen Report indicates that 60% of the 1,475,000 TV households, or 885,354 households, subscribe to cable in the Atlanta DMA. See Attachment 3, Table 5, Nielsen Market Data Report.

as WNGM's own television market. Section 111 of the Copyright Act mandates the payment of copyright royalties by cable operators for the carriage of "distant" signals. Athens, however, is located outside of the "zone" in which copyright liability would not be incurred. The inclusion of Athens in the Atlanta-Rome market designation (on a hyphenated basis) would provide the needed basis for WNGM to be classified as a local signal for copyright purposes. Indeed, although the Copyright Office has currently pending a Notice of Inquiry proceeding to examine the impact of FCC amendments to Section 76.51 on the cable compulsory license (RM 93-5), the Copyright Office has traditionally adopted such amendments to the top 100 list. In fact, in the Comments of the National Association of Broadcasters (the "NAB"), the NAB states its belief that the "Copyright Office has never done anything other than to adopt FCC changes to Section 76.51." NAB Comments at 9. Thus, the addition of Athens on a hyphenated basis would provide great support in WNGM's efforts to be classified as a local signal for copyright purposes.

The Atlanta cable stations are unwilling to carry WNGM, absent indemnification against the increased copyright liability. WNGM has been informed by Wometco Cable Corp., the primary cable system operator in Atlanta, that it estimates increased copyright liability for the carriage of WNGM (for one year only) to be \$2,840,000. See Attachment 10, Letter from Wometco Cable. Wometco has indicated that it would carry WNGM, provided WNGM reimburses it for the increased copyright fees. Id. As a small independent

television station, such an expenditure simply is not feasible. Moreover, because television stations in Atlanta and Athens do compete in the same local television market for all other purposes, WNGM is artificially handicapped in its efforts to compete. As a result, the vast majority of Atlanta cable households are denied WNGM's unique programming.

The exclusion of Athens from the Commission's Top 100 Market designation for Atlanta has other serious and significant consequences for WNGM. For example, WNGM must compete directly with the other Atlanta market stations for television ratings, which in large part, determine advertising rates. For the purposes of syndication rights, WNGM is classified as an Atlanta station, and as a result, is constantly denied programming because another Atlanta station already carries the programming. Moreover, WNGM pays Atlanta rates for most of the programming it does receive. Because WNGM is considered an Athens station for some purposes and an Atlanta station for others, it is placed at a severe handicap in its efforts to ward off the competition that comes to it in Athens from Atlanta.

D. Addition of Athens to the Atlanta market designation would yield tremendous benefits to the public.

Viewers in both Atlanta and Athens would reap substantial benefits from a redesignation of the Atlanta-Rome market to Atlanta-Rome-Athens. WNGM currently broadcasts unique programming which is of interest and benefit to viewers in Atlanta. WNGM broadcasts nightly public affairs programming, which has focused on

Atlanta. For example, feature stories have aired covering the opening of the Georgia Dome in downtown Atlanta, and highlighting the 1996 Olympic Games which will be held in Atlanta. The weekly info-tainment program, "Entertainment Atlanta," which airs on WNGM, includes an on-going calendar of Atlanta events and activities.

WNGM broadcasts countless sporting events which receive little or no attention from the other Atlanta stations. WNGM has aired many University of Georgia ("UGA") sporting events. In 1992, WNGM covered 20 UGA baseball games and 5 UGA women's home gymnastics meets. In the spring of 1993, WNGM aired 20 UGA women's basketball games and all of the gymnastics meets. This coverage was of particular interest, as the UGA baseball team won the College World Series, the gymnastics team won the national championship and the women's basketball team won the Southeastern Conference championship. Other Atlanta stations primarily covered the championship games and meets. WNGM also covers UGA tennis, will be covering UGA volleyball this fall, and expects to begin coverage of UGA swim meets at some point in the future. Considering the fact that a majority of students and scores of alumni of the University of Georgia either come from or currently reside in Atlanta,⁶ the appeal of UGA athletics is undeniable. WNGM has received the appreciation of UGA athletics staff in helping to make women's

⁶ For example, approximately 16,040 of the 28,000 fall of 1992 students at UGA reside within the Atlanta ADI, as do approximately 74,420 alumni. Of these, approximately 9,311 students and 42,135 alumni live in the four counties at the heart of Atlanta: Fulton, Cobb, Gwinnett and DeKalb. See Attachment 11, UGA Enrollment Statistics.

sports more visible. See Attachment 12, letter from UGA Athletic Association. The rich tradition of UGA sports is a vital part of the culture of Atlanta, as well as all of Georgia, and WNGM is establishing itself as a "flag-ship" for these activities.

WNGM does not only focus on collegiate athletics, but covers high school sports as well. WNGM covers the east-northeast Atlanta high-school teams on a regular basis, while together, the other Atlanta stations aired a solitary game last year--the state championship. WNGM covered all of the regular season, the play-offs, and even negotiated to carry the championship. WNGM devoted Christmas Day 1992 to airing high school athletic events. That day, WNGM showed three Northeast Georgia high-school basketball Christmas tournaments and in prime-time, the state high-school football championship. WNGM has also covered area youth soccer, and coverage of this event is planned to be expanded this year.

Another large part of WNGM's format is country music videos. This programming is of great interest and benefit to Atlanta viewers because the country-music format dominates the Atlanta radio ratings. Many of the day's "new country" stars are interviewed on WNGM, and Billboard Magazine has written WNGM up twice as a "future format." See Attachment 13, Billboard Magazine release. WNGM is considered a "pilot-station" for the record labels, as it always promotes new artists, unlike conventional airwaves, which are typically reserved for traditional top acts. WNGM's format is similar to Country Music Television (CMT) and the Nashville Network (TNN), but the format is more viewer-friendly.

WNGM is all request, tracking over 1400 calls daily, many from downtown Atlanta. Nowhere has the country music craze caught on like Atlanta, and WNGM provides the entertainment that the people in Atlanta genuinely enjoy. Recently, a four-level country music high-tech dance center was completed in Atlanta, the most expensive one in the country to date and currently the talk of the town. These types of places have been springing up repeatedly throughout this area for over two years, and the momentum does not appear to be slowing.

The public benefits from WNGM's unique programming, and the inclusion of Athens in the Commission's Atlanta television market will simply legitimize the programming Atlanta viewers can already receive off of the airwaves (and on one cable system) from WNGM. Market redesignation will also provide another public benefit. By eliminating the inconsistent treatment of Athens by the Commission on one hand, and the ratings services, copyright office and programmers on the other hand, WNGM will be able to compete on a level playing field with the Atlanta stations which pervade even the Athens market.

III. Conclusion

WNGM clearly satisfies all of the Commission's criteria for having the Atlanta television market redesignated to include Athens. There is no doubt that the Atlanta and Athens television stations do in fact compete in the same television market. Indeed, the television ratings services have unequivocally indicated that Athens and Atlanta exist in a single television

market. WNGM respectfully requests that the Commission undertake a rule making proceeding, as contemplated by its Report and Order in MM Docket No. 92-259 (rel. March 29, 1993), to update the Top 100 market list to reflect the market reality: Athens is part of the Atlanta television market.

Respectfully submitted,

WNGM TELEVISION PARTNERS, LIMITED

McFADDEN, EVANS & SILL
1627 Eye Street, N.W.
Suite 810
Washington, D.C. 20006
(202) 293-0700

By:



William M. Barnard
Marianne H. LePera

Date: October 14, 1993

ATTACHMENT 1

DECLARATION OF STEPHEN LANIER FINCH

I, Stephen Lanier Finch, do hereby declare:

1) I am Vice-President and General Manager of Television Station WNGM(TV), licensed to Athens, Georgia. I have served in this capacity for 1 1/2 years.

2) I have read the foregoing Petition for Rule Making, and I hereby certify, under penalty of perjury, that the factual assertions relating to the operation of WNGM(TV) contained therein, are true and correct to the best of my knowledge, information and belief.

10/8/93

Date


Stephen Lanier Finch

ATTACHMENT 2

Audience Estimates in the Arbitron Market of

Atlanta

Meter and Diary Measurement

This report is furnished for the exclusive use of Arbitron clients. The television stations which subscribe to this Market Report are:

WSB WAGA WXIA WTBS

Survey Period:

APR 28, 1993 - MAY 25, 1993

Survey Months:

OCT NOV JAN FEB MAY JUL

1992-1993 Survey Dates

October	Sept. 23 - Oct. 20, 1992
November	Oct. 28 - Nov. 24, 1992
January	Jan. 6 - Feb. 2, 1993
February	Feb. 3 - Mar. 2, 1993
March	Mar. 3 - Mar. 30, 1993
May	Apr. 28 - May 25, 1993
July	July 7 - Aug. 3, 1993



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☐ Metro ☐ ADI ☐ TSA
 • City of license ■ City of license of satellite station

Estimates of Households in Market

	TSA	Pct TVHH	ADI	Pct TVHH	Metro Rating Area	Pct TVHH
TOTAL HOUSEHOLDS	2,527,700		1,494,300		1,148,800	
TV HOUSEHOLDS	2,506,900	100	1,483,400	100	1,142,100	100
MULTISET TV HH	1,737,900	69	1,069,200	72	867,400	76
CABLE + OTHER TV HH	1,594,700	64	909,700	61	703,900	62
VCR HOUSEHOLDS	1,994,500	80	1,202,100	81	946,700	83

Television Stations

Call Letters	Channel Number	Affiliation	Home Non-ADI Outside	City of Identification Authorized by FCC
WSB-TV	2	ABC	H	ATLANTA, GA
WAGA-TV	5	CBS	H	ATLANTA, GA
WXIA-TV	11	NBC	H	ATLANTA, GA
WTLK-TV	14	IND	H	ROME-ATLANTA, GA
WTBS	17	TBS	H	ATLANTA, GA
WNGM-TV	34	IND	H	ATHENS, GA
WATL	36	FOX (IND)	H	ATLANTA, GA
WGNX	46	IND	H	ATLANTA, GA
WHSG	63	IND	H	MONROE-ATLANTA, GA
WVEU	69	IND	H	ATLANTA, GA
WGTV	8	PTV	H	ATHENS-ATLANTA, GA
WPBA	30	PTV	H	ATLANTA, GA
VSSO				SPORTS SOUTH NETWORK
VUSA				USA NETWORK

ESTIMATED TO BE ON 56 CABLE SYSTEMS
 ESTIMATED TO BE ON 84 CABLE SYSTEMS

Counties Included in Survey Area

KEY	AREA ASSIGNMENT	TV HH IN ADJACENT ADI	ADJACENT ADI MARKET
A	COUNTY IS IN HOME MARKET ADI		
1	COUNTY IS IN ADJACENT ADI 1	292,000	CHATTANOOGA
2	COUNTY IS IN ADJACENT ADI 2	666,400	GREENVILLE-SPARTANBURG-ASHEVILLE
3	COUNTY IS IN ADJACENT ADI 3	181,700	MACON
0	COUNTY IS IN OTHER ADI MARKET		

METRO COUNTIES				FOUR WEEK				FOUR WEEK			
AREA KEY	CABLE PCT	COUNTY	STATE	TV HH ESTIMATES	TV HH IN-TAB	AREA KEY	CABLE PCT	COUNTY	STATE	TV HH ESTIMATES	TV HH IN-TAB
A	62.5	BARROW	B GA	11,400	7	A	63.1	FORSYTH	B GA	17,900	7
A	59.0	BUTTS	B GA	4,900	4	A	54.4	FULTON	B GA	268,000	239
A	68.3	CHEROKEE	B GA	36,400	30	A	70.9	WINNETT	B GA	145,500	116
A	61.1	CLAYTON	B GA	68,400	42	A	54.0	HENRY	B GA	22,500	19
A	71.3	COBB	B GA	190,600	151	A	56.7	NEWTON	B GA	15,200	14
A	60.0	COWETA	B GA	20,300	20	A	51.8	PAULDING	B GA	16,000	16
A	55.2	DE KALB	B GA	220,000	196	A	56.9	ROCKDALE	B GA	20,200	21
A	76.2	DOUGLAS	B GA	26,500	21	A	63.2	SPALDING	B GA	20,000	13
A	68.5	FAYETTE	B GA	24,200	15	A	54.4	WALTON	B GA	14,100	11
										TOTAL	1,142,100 942

ADI TORUS COUNTIES				FOUR WEEK				FOUR WEEK			
AREA KEY	CABLE PCT	COUNTY	STATE	TV HH ESTIMATES	TV HH IN-TAB	AREA KEY	CABLE PCT	COUNTY	STATE	TV HH ESTIMATES	TV HH IN-TAB
A	59.7	RANDOLPH	B AL	7,700	5	A	51.4	LAMAR	B GA	4,800	6
A	7.5	BANKS	B GA	3,900	8	A	30.0	LUMPKIN	B GA	5,200	8
A	75.3	BARTOW	B GA	21,800	15	A	45.6	MERIWETHER	B GA	7,600	5
A	51.9	CARROLL	B GA	26,800	13	A	57.5	MORGAN	B GA	4,300	4
A	73.4	CHATTOOGA	B GA	8,400	2	A	65.1	OCONEE	B GA	6,500	2
A	86.6	CLARKE	B GA	33,400	18	A	5.0	OGLETHORPE	B GA	3,500	7
A	14.0	DAWSON	B GA	3,800	2	A	41.7	PICKENS	B GA	5,600	6
A	74.5	FLOYD	B GA	30,500	27	A	12.5	PIKE	B GA	3,500	1
A	27.2	GILMER	B GA	5,300	3	A	65.6	POLK	B GA	12,700	5
A	59.3	GORDON	B GA	13,000	5	A	91.7	PUTNAM	B GA	5,400	9
A	79.2	GREENE	B GA	4,000	5	A	63.5	RABUN	B GA	4,800	7
A	57.4	HABERSHAM	B GA	10,200	6	A	67.3	TOWNS	B GA	2,800	5
A	64.7	HALL	B GA	36,500	17	A	72.2	TROUP	B GA	20,400	10
A	39.9	HARALSON	B GA	8,400	10	A	38.3	UNION	B GA	4,900	5
A	18.6	HEARD	B GA	3,400	3	A	64.9	UPSON	B GA	9,800	6
A	35.3	JACKSON	B GA	11,200	7	A	33.9	WHITE	B GA	5,100	5
A	33.3	JASPER	B GA	3,200	5	A	48.7	CLAY	B NC	2,900	2
										TOTAL	341,300 244
										ADI TOTAL	1,483,400 1,186

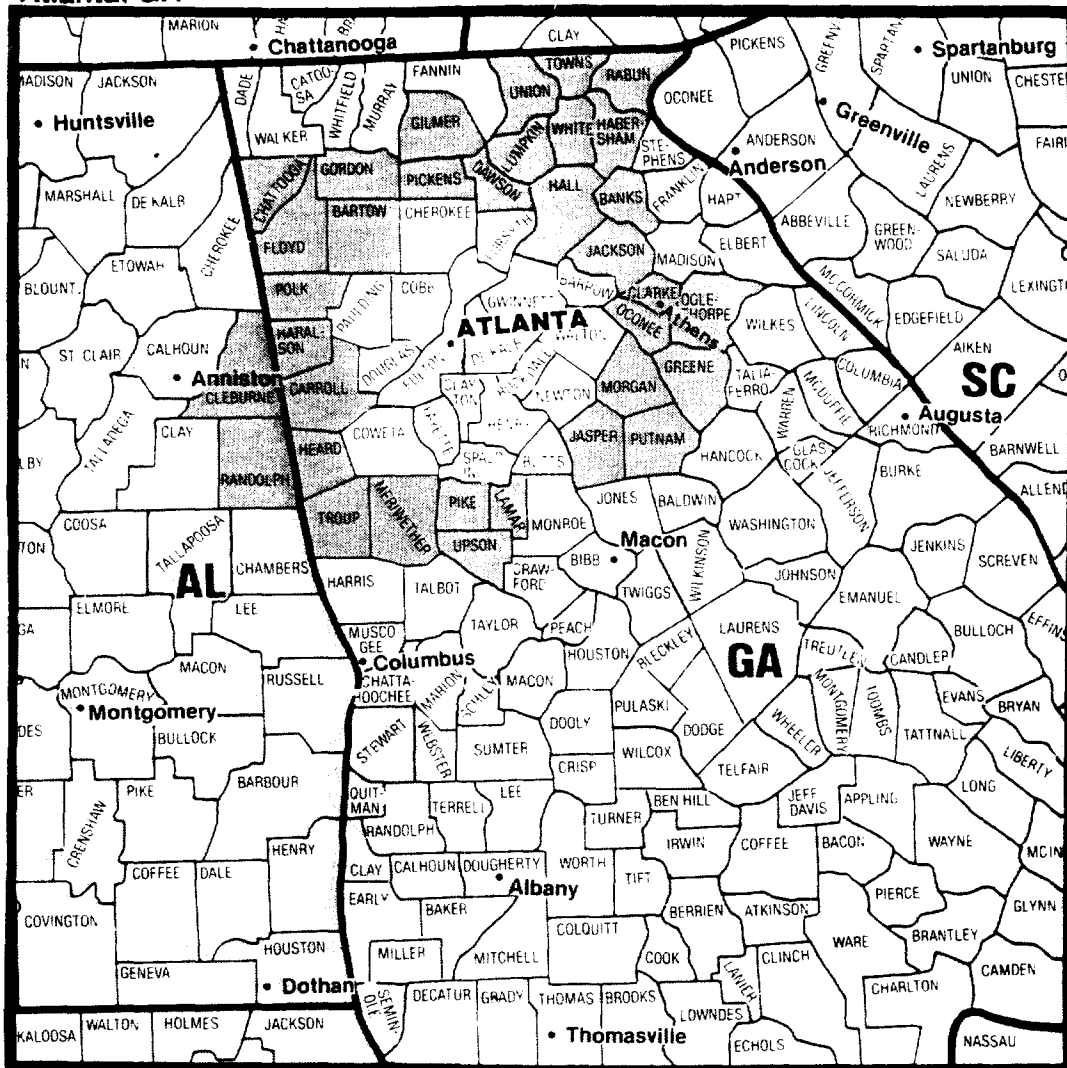
TSA TORUS COUNTIES				FOUR WEEK				FOUR WEEK			
AREA KEY	CABLE PCT	COUNTY	STATE	TV HH ESTIMATES	TV HH IN-TAB	AREA KEY	CABLE PCT	COUNTY	STATE	TV HH ESTIMATES	TV HH IN-TAB
0	80.6	CALHOUN	B AL	43,000	211	3	82.4	BIBB	B GA	56,900	109
0	77.8	CHAMBERS	B AL	13,900	24	1	69.7	CATOOSA	B GA	16,200	30
0	22.2	CHEROKEE	B AL	7,600	11	0	71.7	COFFEE	B GA	10,800	21
0	31.4	CLAY	B AL	5,000	5	0	41.8	COOK	B GA	4,700	10
0	41.8	CLEBURNE	B AL	4,800	13	3	23.7	CRAWFORD	B GA	3,000	4
0	54.3	DE KALB	B AL	21,200	26	0	60.9	CRISP	B GA	7,200	21
0	70.1	ETOWAH	B AL	38,600	34	1	57.8	DADE	B GA	4,700	4
0	48.3	JACKSON	B AL	17,900	35	2	30.8	ELBERT	B GA	7,000	11
0	78.5	LEE	B AL	33,700	63	1	39.7	FANNIN	B GA	6,500	7
0	35.6	MACON	B AL	8,600	11	2	32.0	FRANKLIN	B GA	6,500	5
0	66.1	RUSSELL	B AL	17,800	42	0	47.5	HANCOCK	B GA	2,900	3
0	49.3	TALLADEGA	B AL	26,300	43	0	38.5	HARRIS	B GA	6,600	5
0	62.7	TALLAPOOSA	B AL	14,800	25	2	45.0	HART	B GA	7,600	3
0	82.2	LEON	B FL	78,300	159	3	82.6	HOUSTON	B GA	33,700	50
3	72.0	BALDWIN	B GA	12,100	23	3	62.0	JONES	B GA	7,500	13
0	71.5	BEN HILL	B GA	5,900	9	0	53.4	MACON	B GA	4,300	10
0	44.6	BERRIEN	B GA	5,100	16	2	35.9	MADISON	B GA	7,900	8

C = CABLE CONTROL IMPLEMENTED

B=BLACK DIFFERENTIAL SURVEY TREATMENT IMPLEMENTED IN THIS COUNTY

ATTACHMENT 3

Atlanta, GA



MARKET TYPE

DMA TV Ratings Estimates

MAP LEGEND

● City Location
— State Line

□ CONSOLIDATED
METRO AREA

ATLANTA

■ LOCAL DMA

ATLANTA

See Table 5 for NSI Area County Lists

THE NSI® TECHNIQUE

INTRODUCTION

NSI techniques and procedures used in compiling the audience estimates in this Viewers in Profile® (VIP®) are described in the current edition of the NSI Reference Supplement. The user should refer to the Supplement for information regarding the sample plan, data reported, examples of standard error calculations, as well as for additional detail on other related topics including those treated briefly below.

The use of mathematical terms to express the audience estimates herein should not be regarded as a representation by Nielsen that they are exact to the precise mathematical values stated.

THIS NSI ANALYSIS PROVIDES THE FOLLOWING AUDIENCE ESTIMATES:

WEEKLY CUMULATIVE AUDIENCES (Net Reach) — By Daypart

- DMA Households:** the total number of different TV households reached one or more quarter-hours for the average week and for the 4 weeks of the current measurement period. Cumulative audience percentages for households are based on Meter records only.
- Station Total Households:** Weekly cumulative audience reported in thousands of households is for the average week of the latest all-market measurement period (Nov., Feb., or May) as well as July.

AVERAGE QUARTER-HOUR AUDIENCES — By Daypart and/or By Quarter-Hour or Half-Hour

- HUT (Households-Using-Television):** television households in the Metro/DMA Area with a TV set turned on as a percentage of Metro/DMA Area TV households.
- PUT (Persons-Using-Television):** persons in television households in the DMA that are viewing any station as a percentage of persons in DMA television households.
- Metro/DMA Area Rating:** television households in the Metro/DMA Area tuned to a specific station as a percent of the Metro/DMA Area TV households. DMA ratings are also shown for selected persons categories.
- Metro/DMA Area Share:** television households in the Metro/DMA Area tuned to a specific station as a percent of the Metro/DMA Area TV households with a set turned on.
- DMA In-Market Share:** an estimate of the DMA household 4-week share of viewing received by a local commercial station in comparison to the other local commercial stations in the market. This estimate is only reported in the Daypart Section.
- Trend Guide Data:** DMA HUT and Shares are provided for the a) Daypart and Time Period Sections where data are based on the same Daypart/Time Period for the indicated measurement periods (see column headings) and b) Program Audience Averages Section where data are recomputed based on the "normal" program time period in the current VIP for the indicated measurement periods (see column headings).
- Users are reminded that Trend Guide data are subject to variations due to several factors, such as sampling error and seasonal variations in television viewing. These factors, as well

other considerations outlined in Section IV of this VIP should be recognized in using and comparing data from several measurement periods.

- Station Total Audience:** total U.S. TV households reached.
- Percent Distribution of Station Total Households:** When Station Total Households are reportable in the Home market they are also shown distributed on a percentage basis between the Home Metro area, the Home DMA and up to three selected adjacent DMA's. Where applicable, ratings are also shown for the adjacent DMA's. These data are reported for all dayparts during all-DMA measurement cycles only.
- Audience Composition:** in numbers of persons viewing and their distribution by the demographic categories shown — reported in terms of DMA Ratings and/or Projected Total Persons reached.
- Time Period Section:** Audience estimates are shown (a) as 4-week averages for the dates shown on the cover (exclusions due to special events or other unusual circumstances, if any, are listed on Page 3), and (b) as program time period estimates excluding preemptions, if any. Such "pure" program audience estimates are reported for local stations only.
- Adjacent Quarter-Hour (1/2 hour) Averages:** The average of data for the current quarter-hour and the previous quarter-hour, reported for each time period break. Shown are DMA household ratings plus Station Totals for households and selected demographic categories.
- DMA Weekly Ratings:** DMA Household audiences reported for each week of the measurement on a program average time period basis.
- Program Audience Average Section:** A retabulation of the program audiences (excluding preemptions where applicable). For a description of the rules and procedures for averaging audience data for this section, see the NSI Reference Supplement.
- Persons Share Section:** Persons in the DMA tuned to a specific station as a percent of the DMA Persons-Using-Television (PUT) for this survey interval and three prior intervals.
- TV Households and Persons Trend Section:** Households Using Television (HUT) and Persons Using Television (PUT) are trended for all-DMA measurement periods for this period and four prior years. Rating and Share data are summarized for local commercial stations.

To avoid the implication that the reported averages represent normal operating conditions at all times, a section on "Operating Notes" is included showing dates and times of unusual operating conditions as reported by the stations.

II AREAS MEASURED

Metro Area: the Metro Area is the Metropolitan Statistical Area (MSA) as defined by the Office of Management and Budget brought to county line basis to include counties having over 50% of their population in the Metro Area. In the absence of an established Metro Area, or where in Nielsen's judgment a Metro Area may not represent the TV market(s) served by a group of TV stations, a group of counties may be substituted to serve this purpose. Such an area is titled (Continued on Inside Back Cover)

MARKET DATA

ATLANTA, GA
DMA RANK # 10

APRIL 29 - MAY 26, 1993

TABLE 1 - UNIVERSE ESTIMATES - JAN. 1993

AREA	TOTAL HOUSEHOLDS	TV HOUSEHOLDS	TV HOUSEHOLDS BY COUNTY SIZE †			
			A	B	C	D
METRO	1,148,800	1,135,100				
DMA	1,496,100	1,475,590	1,135,100		185,030	155,460
NS	1,829,700	1,803,470	1,135,100	56,710	289,500	322,160
			63	3	16	18

TOTAL HOUSEHOLDS are estimated by Market Statistics (MSI), used by special permission of that organization. They are the base against which television ownership percentages have been applied. TELEVISION OWNERSHIP PERCENTS are Nielsen estimates based on combining historical projections from the 1960 and 1970 Censuses with estimates from the NSI telephone interviews from a number of all market measurement periods.

HOUSEHOLDS ARE OCCUPIED HOUSING UNITS. The household universe estimates shown in Table 1 are estimates of year-round households, i.e., housing units occupied year round. Seasonal housing units which are occupied only during certain seasons of the year are not included in the Household Universe Estimates. Thus, the number of households during the survey period may differ from the estimate in Table 1.

† See NSI Reference Supplement for definition of county size.

LT Less than 1%

TABLE 2 - PENETRATION ESTIMATES

AREA	PERCENT OF TV HOUSEHOLDS				
	BLACK %	HISPANIC %	MULTI-SET %	CABLE TV %	VCR %
METRO	25	2		61	
DMA	22	2	73	60	79

Multi-set estimates are based on the metered sample. Multi-set, Cable TV and VCR estimates are based on the latest available data. Black and Hispanic estimates are as of January 1, 1993. See NSI Reference Supplement for detail.

TABLE 3 - SAMPLE SIZES: HOUSEHOLDS

AREA	METER SAMPLE IN-TAB AVG.	DIARY SAMPLE(1)					
		INITIALLY DESIGNATED HOUSEHOLDS			IN-TAB DIARY HOUSEHOLDS		
		LISTED	UNLISTED	TOTAL	LISTED	UNLISTED	TOTAL
METRO	290 (EST D)	1144	815	1959	484	288	772
DMA(INCL. METRO)	377 (2)	1506	991	2497	631	343	974
NON-DMA	---	1232	587	1819	505	186	691(3)
NSI(INCL. DMA)	377	2738	1578	4316	1136	529	1665

(1) The Non-DMA (Diary) sample is combined with the DMA meter sample for compiling Station Total households; the entire diary sample is used for Audience Composition data.

(2) Yields an appropriate equivalent simple random sample size of 736.

(3) + (3) NSI Area Station Total households herein are based on these in-tab samples and yield an approximate equivalent simple random sample size of 939.

Equivalent simple random sample size is a term sometimes used for the statistical equivalent of the sample size for computing sampling errors or statistical tolerances.

For sample selection procedures in Total Telephone Frame markets, see NSI Reference Supplement.

TABLE 4 - TELEVISION STATIONS

CITY OF ORIGIN	STATION	CHANNEL	AFFILIATION
ATLANTA	*WAGA	5	C
ATLANTA	*WATL	38	I-F
ATLANTA	*WGNX	46	I-F
ATHENS	*WGTV	8	I-F
MONROE	*WHSB (L)	63	I-F
ATHENS	*WNGM (L)	34	I-F
ATLANTA	*WPBA	30	P
ATLANTA	*WSB	2	A
ATLANTA	*WTBS	17	T
ROME	*WTLK	14	I
ATLANTA	*WVEU	69	N
ATLANTA	*WXIA	11	N
CABLE	ESP (D)		
CABLE	NIK (D)		
CABLE	SPS (D)		
CABLE	TNT (D)		
CABLE	USA (D)		

(L) THIS LOCAL STATION IS REPORTABLE IN THE DAYPART SECTION ONLY.

(D) THIS OUTSIDE STATION IS REPORTABLE IN THE DAYPART SECTION ONLY.

IN ADDITION TO THE REPORTABLE STATIONS SHOWN ABOVE, THE FOLLOWING STATIONS ORIGINATE IN OR ARE ASSIGNED FOR REPORTING PURPOSES TO THIS MARKET BUT DID NOT MEET THE MINIMUM REPORTING STANDARDS (SEE REPORTING STANDARDS, INSIDE BACK COVER).

LA GRANGE WGBN 33 I

WGBN IS LPTV STATION W33AT.

TABLE 5 - TV HOUSEHOLDS AND IN-TAB DIARY HOUSEHOLDS BY SAMPLING AREA

ADJ DMA CTRY	COUNTY & STATE	MRS TERRITORY†	EST. TV HHLS JAN. 1993	CABLE TV HHLS % MAY 1993	IN-TAB DIARY HHLS
#1	CALHOUN AL SE	42,820	75	C	226
	CHAMBERS AL SE	13,820	72	D	29
	CHESTER AL SE	7,500	35	D	6
	CLEBURNE AL SE	4,710	38	D	7
	D RANDOLPH AL SE	7,680	41	D	4
#2	D BANKS GA SE	12,080	69	D	26
	D BARTOW GA SE	3,950	24	D	4
	D BARTOW GA SE	11,420	38	A	13
	D BARTOW GA SE	21,750	59	C	9
	D BEN HILL GA SE	5,850	65	D	15
	D BIBB GA SE	56,710	78	B	89
#2	D BUTTS GA SE	4,880	37	A	4
	D CARROLL GA SE	26,620	52	C	16
	D CHATTAHOOGA GA SE	8,380	71	D	7
	D CHEROKEE GA SE	36,330	60	A	26
	D CLARKE GA SE	32,710	81	C	20
	D CLAYTON GA SE	68,250	58	A	44
	D COBB GA SE	188,430	74	A	132
	D COFFEY GA SE	10,790	79	D	20
	D COWETA GA SE	20,220	50	A	15
	D DAWSON GA SE	3,830	9	D	1
	D DE KALB GA SE	218,480	62	A	142
	D DOUGLAS GA SE	26,430	57	A	21
	D ELBERT GA SE	7,030	44	D	8
	D FANNIN GA SE	6,410	38	D	18
#3	D FAYETTE GA SE	2,030	64	A	22
	D FLOYD GA SE	30,200	71	C	19
	D FORSYTH GA SE	17,780	60	A	11
	D FRANKLIN GA SE	6,440	39	D	6
	D FULTON GA SE	265,450	52	A	148
	D GILMER GA SE	5,270	34	D	5
	D GORDON GA SE	12,890	54	D	10
	D GREENE GA SE	9,980	52	D	9
	D GWINNETT GA SE	145,020	72	A	125
	D HABERSHAM GA SE	9,960	49	D	10
#2	D HALL GA SE	36,220	72	D	26
	D HANCOCK GA SE	2,930	34	D	5
	D HARALSON GA SE	8,410	43	D	3
	D HART GA SE	7,650	41	D	8
	D HEARD GA SE	3,340	11	D	1
	D HENRY GA SE	22,500	55	A	19
	D JACKSON GA SE	11,130	34	C	7
	D JASPER GA SE	3,230	21	D	1
	D JEFF DAVIS GA SE	4,300	52	D	2
	D LAMAR GA SE	4,810	44	D	4
#2	D LAURENS GA SE	14,410	60	D	21
	D LAUNDES GA SE	26,380	76	C	68
	D LUMPKIN GA SE	5,160	8	D	3
	D MADISON GA SE	7,840	28	C	6
	D MERIWETHER GA SE	7,550	33	D	13
#2	D MONROE GA SE	6,020	32	D	13
	D MORGAN GA SE	4,320	34	D	5
	D NEWTON GA SE	15,080	56	A	7
	D OCMULGE GA SE	6,220	76	C	7
	D OGLETHORPE GA SE	3,500	36	D	1
	D PAULDING GA SE	15,830	52	A	7
	D PICKENS GA SE	5,640	28	D	3
	D PICKENS GA SE	3,530	19	D	3
	D POLK GA SE	12,670	62	D	3
	D PUTNAM GA SE	5,400	43	D	3
	D RABUN GA SE	4,710	61	D	3
	D ROCKDALE GA SE	1,960	83	A	11
	D SPALDING GA SE	19,990	49	A	12
	D STEPHENS GA SE	8,110	59	D	10
	D TOOMBS GA SE	8,840	73	D	12
	D TOWNES GA SE	2,680	58	D	3
	D TROUP GA SE	20,180	70	C	9
	D UNION GA SE	4,890	34	D	3
	D UPSON GA SE	7,770	55	D	4
	D WALTON GA SE	14,010	60	A	10
	D WHITE GA SE	5,090	13	D	3
#3	D WILKES GA SE	27,430	76	C	44
	D WILKES GA SE	3,890	44	D	7
#3	D CHEROKEE NC SE	8,050	42	D	15
#3	D CLAY NC SE	2,820	40	D	4
	D HAYWOOD NC SE	19,000	71	D	21
	D MACON NC SE	9,680	51	D	12

METRO TOTAL 1,135,100 81 772
DMA TOTAL 1,475,590 60 974
NSI AREA TOTAL 1,803,470 61 1,865

#1 = ANNISTON #2 = MACON
#3 = CHATTAHOOGA
NOTE: VIEWING IN ADJACENT DMA'S IS NOT LIMITED TO NSI AREA COUNTIES IN TABLE 5. THE ABOVE LIST OF COUNTIES DOES NOT NECESSARILY REPRESENT ENTIRE AREA FOR WHICH VIEWING OCCURS TO STATIONS IN THIS MARKET. SEE INSIDE BACK COVER FOR FURTHER STATION TOTAL AREA DESCRIPTION.

Initially, approximately 49% of the pre-designated Atlanta DMA basic meter sample households are recruited and installed. For a typical report period, approximately 46% of the installed meter sample are pre-designated households.

SPECIAL NOTICE:

Station Total Audiences (000) for WTBS-TV are reported herein on geography limited to the counties comprising the NSI Area as listed in Table 5 above. This geography limitation applies also to the WTBS Adjacent DMA data as shown in the Daypart section.

The NSI Area for Atlanta comprises the counties listed above (Table 5) and accounts for virtually 95% or more of the average quarter-hour total household audience, 9:00AM-12:00MD for all local stations except WTBS. See Section II on the inside cover of this analysis and Section A.1.A. of the NSI Reference Supplement for NSI Area description, station total households and related. Except for WTBS station total audience estimates during all-market measurement periods are compiled on a quarter-hour by quarter-hour basis - whether from within or outside the NSI Area - and are not affected by geographical considerations.

Audience estimates are computed separately for each week. Reported multi-week averages are the average of the appropriate individual week audience estimates. Some of the above counties may have been combined for projecting individual week audience estimates. Viewing among the households in the in-tab sample for all counties that are combined are projected to the total TV Households for the combined counties. These county groupings are available upon request.

M = Metro County; D = Designated Market Area County (for definition see Section II).
** The DMA meter sample currently approximates 420 television households in which meter equipment is installed; 439 households (including households replaced during the survey period) provided records meeting Nielsen accuracy standards during one or more days of this survey interval, including 377 households on the average individual day.

† See NSI Reference Supplement for explanation of MRS Territory and County Size.

* = NSI Client; ** = Independent Station; I-F = Independent-Fox Network Affiliate
I-S = Independent-Subscription TV Station; I = Turner Broadcasting System
P = Educational and Public Broadcasting Service Stations; P-C = Public Broadcasting-Commercial
Network affiliation as shown herein is based on information supplied by the networks for use in Nielsen Television Index (NTI). For additional details, see the NSI Reference Supplement.

ATTACHMENT 4